



Iowa Department of Natural Resources
Underground Storage Tanks Section
502 East 9th Street
Des Moines, IA 50319-0034

Iowa DNR – UST Section

Fact Sheet for Operator Training Providers

This fact sheet has been developed in accordance with the Federal Energy Policy Act, 40 CFR Part 280, US EPA Operators Training Guidelines and the Chapter 567—135 Technical Standards and Corrective Action Requirements for Owners and Operators of Underground Storage Tanks

To deliver training to Class A and/or Class B operators who operate in the State of Iowa, you must:

- Develop a training curriculum and materials that meet the DNR's requirements for training Class A and/or B operators (see below for specific requirements).
- Submit the training curriculum (including method of delivery and assessment tool/exam) to the DNR UST Section for review. Allow at least 30 days for the DNR UST Section to review before scheduling course offerings. By providing operator training prior to obtaining the DNR's approval, you take the risk that the course may not qualify for approval which could jeopardize your relationship with the clients you are trying to serve. Further, providing a course marketed as meeting DNR's operator training requirements *prior to DNR approval* may be subject to disciplinary action.
- If the course will be delivered by classroom or hands-on instructors, submit to DNR a resume or qualification summary for each instructor demonstrating his/her UST experience and proficiency with the new regulatory requirements, and his/her experience in providing classroom instruction.
- Obtain DNR's written approval of your training course(s) prior to delivering it to Class A and/or B operators.
- Administer the approved assessment or written examination after each training, to test knowledge and understanding of operators. Provide follow-up review on exam results to ensure students understand why they missed test questions.
- Provide signed and dated training certificates to Class A and/or B operators who successfully complete the course.
- Maintain records indicating the date, location, names of trainers, names of trainees operating in the State of Iowa who completed and passed the course by class of operator.
- Make records available to DNR, as requested.
- After the initial training curriculum has been approved, notify DNR of any major changes you plan to make to the curriculum and resubmit to DNR for approval.

Training Requirements per Operator, pursuant to 567—135.4(6)

The UST Regulations (567-135.4(6)) were revised and published on September 9, 2009. The new regulations provide that operators can be trained starting in 2009, although DNR will not enforce this requirement until December 31, 2011.

Required training for Class A operators includes the following specific areas:

1. Spill and overfill prevention
2. Release detection and release prevention
3. Suspected and confirmed releases and reporting requirements
4. Corrosion protection
5. Emergency response, spill response, release reporting
6. Product and equipment compatibility
7. Financial responsibility and site check requirements when insurance is cancelled
8. Notification and UST registration requirements
9. NESHAP requirements
10. Fuel ordering and delivery, color-symbol codes in API RP 1621
11. Third party compliance inspection procedures
12. Installation requirements for USTs (licensed installers/licensed installation)
13. Notification of Installation, change of ownership, annual tank management fee
14. Delivery prohibition
15. Report and recordkeeping requirements
16. UST permanent closure requirements
17. Temporary and permanent UST closure requirements
18. Class A, B, and C operator training requirements
19. Recommended practices for inspections and maintenance.

Required training for Class B operators includes the following:

1. Spill and overfill prevention,
2. Release detection and release prevention
3. Corrosion protection
4. Emergency response, spill response, suspected and confirmed releases, and release reporting requirements
5. Product and equipment compatibility and materials used in UST system components
6. Components of UST systems
7. Financial responsibility and site check requirements when insurance is cancelled
8. Notification and UST registration requirements
9. NESHAP requirements
10. Fuel ordering and delivery, color-symbol codes in API RP 1621
11. Third party compliance inspection procedures
12. Installation requirements for USTs (licensed installers/licensed installation)

13. Notification of Installation, change of ownership, annual tank management fee
14. Delivery prohibition
15. Report and recordkeeping requirements
16. UST permanent closure requirements
17. Temporary and permanent UST closure requirements
18. Recommended practices for inspections and maintenance
19. Class C operator training requirements

The course material and instruction must cover Chapter 135 UST Technical Standards and Corrective Action Requirements for Owners and Operators of Underground Storage Tanks; Chapter 134 as it pertains to compliance inspections, UST installation and removal requirements and compliance inspections; and Chapter 136 as it pertains to financial responsibility requirements.

Course content, discussion and testing must also reference PEI/RP900-08 Recommended Practices for the Inspection and Maintenance of UST Systems, and PEI/RP500, Recommended Practices for the Inspection and Maintenance of Motor Fuel Dispensing Equipment.

Required Training for Class C Operators includes the following:

1. General overview of the DNR's UST program and purpose, e.g., groundwater protection goals; public and environmental protection.
2. Emergency response, spill response
 - a. Determine the size of spill (what is a large spill and what is a small spill)
 - b. Where the clean up material is located on site
 - c. How to respond/clean up a surface spill – (what to use and how to use it)
 - d. How to dispose of the used clean up materials – (storage at the location)
 - e. When to clean up a spill
 - f. Emergency shutdown procedures
 - g. Whom to contact in the event of a surface spill, suspected release, equipment alarm or equipment malfunction, and how to contact them.
3. Training must include written basic operating procedures for the Class C operator, including notification instructions in the event of emergency conditions (emergency contact names, and telephone numbers).

Required training for Class C operators:

Class A or B Operators may provide training for Class C Operators or they may attend training provided by an external training provider. At a minimum, training provided by the Class A or B to a Class C operator shall enable the Class C operator to take action in response to emergencies or alarms caused by spills or releases from a UST system. Training shall include written instructions or procedures for the Class C operator to

follow and to provide notification necessary in the event of emergency conditions. After the initial training, Class C operators shall be briefed by the Class A or B operator on these instructions or procedures at least annually (every 12 months).

The DNR UST Section documents are available on our website:

<http://www.iowadnr.gov/land/ust/index.html>

Material to Submit to the UST Section for Approval

To apply for UST Section approval of a training program, a third-party training provider shall submit to the department, at least 30 days before the requested approval date:

1. A detailed description (outline) of course content and the amount of time allotted to each major topic;
2. The PowerPoint presentation of the course material submitted in handout form.
3. A copy of the exam for each class of operator and the answers to the exam;
4. An explanation of how wrong answers to test questions will be reviewed and correct answers enforced;
5. When requested by the department, copies of all materials proposed for use;
6. A copy of the course evaluation completed by the participants.

The UST Section staff may attend a third-party training program as an observer to verify whether the provider conducts the training in accordance with the requirements of owner/operator training rules and in accordance with the program as approved by the department. The department may approve a third-party training program if the program meets the requirements of the owner/operator training rules.

If a Class A or B operator has completed operator training in another state, the department may approve the training if the training requirements of the other state are at least as stringent as the training requirements under Iowa's rules.

The department may suspend its approval if it finds that the program fails to meet the requirements of 567—135.4(6) or is not in accordance with the program as approved by the department.